

**STATE OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of)	
Telecommunications and Energy on Its Own)	
Motion To Implement the Requirements Of)	DTE. 03-60
The Federal Communications Commission's)	
Triennial Review Order Regarding Switching)	
For Mass Market Customers)	

**CONVERSENT COMMUNICATIONS OF MASSACHUSETTS, LLC'S NINTH SET OF
INTERROGATORIES TO VERIZON**

Conversent Communications of Massachusetts, LLC ("Conversent") hereby requests that Verizon respond fully to each of the following interrogatories based on all information that is in its possession, custody or control, including that information which is in the constructive possession of Verizon. Conversent requests that Verizon produce responses to these interrogatories in the offices of Conversent, 222 Richmond Street, Suite 301, Providence, RI 02903 within seven (7) days of the date of service of these interrogatories.

DEFINITIONS

1. "Affiliate" means "a person or entity that directly or indirectly owns or controls, is owned or controlled by, or is under common ownership or control with, another person or entity. For purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more that 10 percent." 47 U.S.C. § 153(1). Conversely, "Unaffiliated" means a person or entity that does not meet the definition of Affiliate.

2. "Verizon", "you" and "your" mean Verizon and any other person or entity acting on its behalf, including, but not limited to, its attorneys, agents, investigators, clerks, experts, representatives, consultants and other related corporate entities and affiliates.

GENERAL INSTRUCTIONS

You are instructed to respond to the set interrogatories fully and completely. The words "and" and "or" as they are used in these interrogatories shall be interpreted in the conjunctive to require responses to all sub-parts and all categories within each interrogatory. With respect to each interrogatory, all information is to be divulged which is in your possession, custody, or control, including that information which is in your constructive possession. All answers must be made separately and stated in writing under oath by an officer of Verizon. When an interrogatory calls for an answer in more than one part, each part should be separated in the answer so that the answer is clearly understandable. You are also under a continuing duty to amend prior discovery responses if you obtain information which renders a discovery response incorrect when made, or if said response was correct when made, but is no longer correct in light of new or additional information.

INTERROGATORIES

CONV-VZ 9-1: What is the rate that the DTE approved in Docket 01-20 (but which has not yet been allowed to go in effect) for non-WPTS hot cuts for 2 wire analogue loops, for both initial and additional loops?

CONV-VZ 9-2: Do you agree that the rate that Verizon proposed for a WPTS hot cut for a 2 wire analogue loop in a revised compliance filing in Docket 01-20 dated

June 12, 2003 was \$42.65 for the first loop and \$31.98 for additional loops?

CONV-VZ 9-3: Do you agree that the rate for a WPTS hot cut for a 2 wire analogue loop that Verizon is proposing in this Docket is \$73.78 for the first loop and \$37.23 for additional loops?

CONV-VZ 9-4: Please identify all of the differences in methodology, inputs and assumptions between the WPTS cost study filed in Docket 01-20 on or about June 12, 2003 and the WPTS cost study filed in this Docket that cause the rate for WPTS hot cuts to increase from \$42.65 (initial) and \$31.98 (additional) to \$73.78 (initial) and \$37.23 (additional). Please provide a copy of all work papers that show such differences.

CONV-VZ 9-5 Please identify all of the differences in methodology, inputs and assumptions between the non-WPTS hot cut cost study that was approved in Docket 01-20 and the WPTS cost study that was filed in this docket. Also, please explain in detail all changes that were made to the WPTS cost study that reflect a more efficient, less manually intensive and less expensive process associated with WPTS. Please provide a copy of all work papers that show such difference and changes.

Dated: February 13, 2004

Scott Sawyer
Vice President of Regulatory Affairs
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